

United States District Court for  
The Western District of Pennsylvania  
Case No.

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SEP 11 2018

Dana W.Wiley,  
Plaintiff,

U.S. DISTRICT COURT  
DIST. OF PENNSYLVANIA

v.

World Wrestling Entertainment  
CEO:Vince McMahon and John Due  
D-Generation X / NWO Wrestling employees,  
Defendants;

18-1207

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Plaintiff's complaint for (1)Federal Trademark Infringement,  
15 u.s.c 1114; (2)Fair use copyright trademark agreement to advertist,promote and  
distribute, without unfair royalty payment pursue of unfair competition,  
15 u.s.c 1125(a);(3)Deceptive And Unfair Trade Practces, F.S.A 501,(4)Breach of  
Contract.

#### I.Introduction.

This matter concern's the trademark of the defendants;CEO, Vince McMahon and  
John Due of the D-Generation X/ New World Order wrestling employees for failure  
to release the official copyright contract hereto plaintiff,Dana Wiley along with  
royalty payment for above work titled: D-Generation X/ New World Order Merchandise  
in support of Exhibit(A)page 1 of 6.

#### 2.Introduction.

Dana Wiley brings this action to secure relief under federal and Pennsylvania  
state law.Dana Wiley seeks:(a)Temporary Preliminary and Permanent injunctions;  
pursuant to 15 u.s.c 1117(a)  
requiring the defendants to release the official fair use copyright contract  
(B)royalty payment damages and (C)defendant pay cost of this action and any legal  
fee's.

#### II.Parties

1.Plaaintiff,Dana Wiley is a public residence under the laws of the state of  
Pennsylvania at:531 Case Street Apt-9 Rochester, Pa 15074  
cell phone:724/558/7679.he is in good standards with the federal and state  
Pennsylvania laws.he has exhausted all federal and state remedise and done  
everything and necessary and proper to bring this lawsuit.

2.Defendants based on information and belief.World Wrestling Entertainment CEO;  
Vince McMahon John Due of the D-Geberation X / New World Order wrestling employees  
has jurisdiction of this matter and is located at above address:  
1241 East main street Stamford, CT 06902

#### III.Jurisdiction And Venue

This Court has original jurisdiction pursue to the 5th amendment under 15 u.s.c  
1121(a)  
(action arising under the Lanham Act) and 28 u.s.c 1331,1338(a) (federal question)  
in that this case arises under the Trademark Laws of the United States,  
15 u.s.c 1051-1127.

2.This Court has jurisdiction pursue to the 5th amendment under 28 u.s.c 1338(b)  
in accordance with the principles of pendant jurisdiction in that said claims are  
joined with substsntial and related claims under the Trademark of the

United States,15 u.s.c 1051-1127.

Statement of Facts.

1. Plaintiff,Dana Wiley signed a fair use copyright contract with the above defendants;world wrestling entertainment:CEO;Vince McMahon John due of the D-Generation X / New World Order wrestling employees on August 21,1995 in front of the Lawrence County Courthouse of New Castle, Pa officialy after Dana Wiley was sentence in a unrelated criminal case No.1144/1994 for the above trademark work titled(D-Generation X/ New World Order merchandise.
- 2.These defendant's over 20 plus year's has ignored nor respondent to numerous cease and desist notice,similar as exhibit(A) Page 1 of 6 that plaintiff,Dana Wiley sumbitted to the defendant's on July 12,2018.
- 3.These defendant's has failed to release a copy of the fair use copyright contract hereto plaintiff,Dana Wiley for the above trademark work titled:D-Generation X and New World Order Merchandise along with a royalty payment.

Conclusion.

Hererfotd on above day of ~~Se P:10~~,2018 Plaintiff,Dana Wiley hereby seek's (a) Temporary preliminary and permanent injunctions pusrue to 15 u.s.c 1117(a)  
(A)Court ordering the defendants to respond to the allegations of these facts in support of exhibit (A)page 1 of 6 within (30) days.

(B)court order the defendant's to release official copy of the fair use copyright contract hereto Plaintiff,Dana Wiley.

(C)court order the defendant's to pay royalty damages hereto plaintiff,Dana Wiley in the amount of \$75-million no less then \$10-million herefor above trademark work titled(D-Generation X / New World Order Merchandise.

(D)require the defendant's to pay cost of this action or any legal fee's by the court's.

The said allegation are hereby true and correct in accordance of the United States laws of the u.s constittution of perjury the above defendant's has been hereby pro'se serve by the clerk of courts of the United States Federal Court of Western Pennsylvania and plaintiff,Dana Wiley.

First class certified mail  
on above Date:September 10,2018

Dana Wiley,Plaintiff  
531 Case Street Apt-9  
Rochester,Pa 15074  
cell phone No.724-558-7679

Dana Wiley

World Wrestling Entertainment  
CEO;Vince McMahon John Due of the  
D-Generation X / New World Order  
wrestling employees  
1241 East main street  
Stamford,CT 06902

EXHIBIT (A) Page 1 of 6

CEASE AND DESIST NOTICE  
REQUEST FOR ROYALTY PAYMENT  
FOR INFRINGEMENT OF COPYRIGHT

Dear;World wrestling Entertainment  
CEO:Vincent McMahon And All  
D-GenrationX/NWO Wrestling Employees

Case No.7/12/2018

"STATEMENT OF Facts"

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It has become to my attention I hereby confirm that (WWE.ET-AL) wrongfully infringed my right's in accordance to section;107 of 1988  
Campbell Vs. Acuff-Rose Music,Inc and  
Automatic Radio Co Vs.Hazeltine Research,Inc.,339 U.S. 827(1950)  
herefor the copyright work entitled(D-GenrationX/NWO merchandise).

STATEMENT OF ARGUMENT

(WWE.ET.AL) over the course of 20-year's they have officially failed to provide I, Dana W.Wiley a royalty payment for the above work entitled.  
(D-GenrationX/NWO merchandise) you have all so ignored several letter's Dated:3/9/2011., from I,Dana W.Wiley seeking royalty payment of sum \$3-million a year for life time payment; along with a copy of the official fair-use Law act of sect,107(1988)5th amendment; copyright contract we agreed upon on the above date of August 21,1995.

STATEMENT OF COLLUSION

-----  
I,Dana W.Wiley; seek's the royalty settlement payment of \$75-million no less then \$10-million herefrom (WWE.ET.AL)  
for the above work entitled (D-GebrationX/NWO Merchandise)  
WWE.,ET.AL) has officially (30) Day's to resolve this matter with I,Dana W.Wiley in accordance of Privacy law-Act of 1974,5 u.s.c 552a,  
if (WWE.ET.AL) failes to resolve this matter within (30)Day's you hereby waive all right's and officially confirm the said foregoing is true and correct pursue to the penalty of perjury section,(18 u.s.c 1621).

SINCERELY TURLY YOUR'S

-----  
DANA W.WILEY;  
531 CASE STREET APARTMENT#9  
ROCHESTER,PA 15074  
CELL PHONE NUMBER#724/558/7679  
EMAIL:williamdana806@yahoo.com  
Wileydana07@gmail.com  
Date:7/12/2018

*Dana W.Wiley*

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MR. DANA W. WILEY CT-9123

Date Birth 3/22/1977

Place Birth Detroit Mich

SSI No. 173-58-3176

home Address

111 S. MILTON ST NEWCASTLE PA. 16101 or

SCI. Greene 175 Progress Drive Waynesburg PA. 15370

Phone No. 724-947-0997 or 724-652-5935

The information is I DANA.W.WILEY CT-9123

AKA ghetto.D

True and correct Identification under  
U.S. CONST of PENALTY Perjury Law.

Grievance complaint  
request under section 703(H) Law and  
release documents

here and To The employer

CEO of World Wrestling Entertainment

Fax No. 203-359-5151

Phone No. 203-352-8600 or 212-398-1815

Date, 3/9/2011

Page 2 of 1

Date month and year employed by WWE

7th 8 and 9 day October 1994

21th day August 1995

September 1996 and October 2, 1998

I am as to date still employed by WWE

Yes on 9 day of march 2011.

I been employed by WWE for  
seventeen years

WWE require my job to be superstar wrestler  
write and create music song sounds and  
design The Degeneration X and NWO ET-AL clothing  
line with investment of seventy \$75 million  
DOLLARS into WWE stock market along with  
TNA Impact

WWE require to Pay me over Three<sup>\$</sup>(3) or more  
million DOLLARS a Year

The employer of WWE employees have the  
copy rights of my name Degeneration X and  
NWO.ET-AL

Page 3 of 1

my employer and employees of WWE has copies several Entertainment Photo News articles of I DANA.W.WILEY CT-9123 AKA Ghetto.D with Eric Wright AKA Eazy.E ET-AL That was taken by News Dept of Ohio Newcastle PA - USA Today and Entertainment Weekly from Southern Park mall Boardman Ohio and Old Down Town Newcastle PA mall Threw out all 1994 and 1996 of 1998 from Yo-MTV raps and BET rap city Ladies night show

### Statement of Request

I DANA.W.WILEY CT-9123 AKA Ghetto.D on 9 Day of March 2011 is request to my employer from WWE who has multitude million dollar copy right and seventy five \$75 million dollar U.S. Treasury WWE and TNA Impact stock market investment contract agreement with me as of to date will cash pay me fifty one \$51 million dollar pursue section 703(H) Payment Law with in next fifteen (15) days follow by Lifetime cash Payments of Three \$3 million dollars a year.

Page 4 of 1

Therefore my employer from WWE has the statute time fifteen (15) day to make That fifty one \$51 million dollar payment with the release several Entertainment Photo News article of me with Eric Wright AKA EAZY.E, et and The Government Documents involving Lawsuit Lisa Lopez AKA LeftEye filed on behalf my competence here and on The US IRS Treasury Dept back in September 1996 involving them Treasury checks formal President Administrative BILL.W.J.Clinton first class mail to me back in October 1994 for sum seventy five \$75 million Dollars a piece which is in your and other Government official Possession as of todate if my employer from WWE fail to comply with in that statute time I will file my complaint here and to US.EEOC of western PA William S. Moorhead and seek the compensation relief. I request from my employer in this complaint.

Page 5 of 1

I, DANA W. WILEY CT-9123 AKA ghetto.D  
DECLARE BY US CONST of LAW  
Pursue to Penalty of Perjury the said  
facts are true and correct That my employer  
from world wrestling ENTertainment was given  
fax or first class mail notification  
on 9 day and month March 2011  
from address  
111 S. Milton ST New castle PA 16101 and  
175 Progress Drive Waynesburg PA 15370

sincerely  
mr.Dana.W.Wiley

Date 1/1/2011

**Certificate of Service**

I hereby certify that a true copy of the foregoing Consent was served (by mail) (by hand delivery) (via electronically) on all parties of record in this cause, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

**Signature** \_\_\_\_\_